

From: [Nancy Fitz](#)
To: [Joanne Durand](#)
Cc: eric@aginodata.com; [Jeanne Kasai](#)
Subject: Re: Labeling requirements
Date: 06/21/2011 07:58 AM
Attachments: [Retest and Inspection Requirements for IBCs 03.02.11.docx](#)

Hi Joanne and Eric,

I am going to be in and out of meetings all day, so it's easier to respond by email. If you have questions, give me a call. If I don't answer, I'll call you back during one of my breaks.

Question 1: Are there any requirements for label size; min, max or otherwise for containers?

Answer 1: There are no general minimum or maximum sizes for a pesticide label. Pesticide labels must comply with the performance standards in 40 CFR part 156. Here are some of the requirements that affect label size:

§156.10(a)(4): Prominence and legibility.

(i) All words, statements, graphic representations, designs or other information required on the labeling by the Act or the regulations in this part must be clearly legible to a person with normal vision, and must be placed with such conspicuousness (as compared with other words, statements, designs, or graphic matter on the labeling) and expressed in such terms as to render it likely to be read and understood by the ordinary individual under customary conditions of purchase and use.

(ii) All required label text must:

- (A) Be set in 6-point or larger type;
- (B) Appear on a clear contrasting background; and
- (C) Not be obscured or crowded.

§156.10(i)(2) Contents of Directions for Use. The directions for use shall include the following, under the headings "Directions for Use":

...(ix) Specific directions concerning the storage, residue removal and disposal of the pesticide and its container, in accordance with subpart H of this part. These instructions must be grouped and appear under the heading, "Storage and Disposal." This heading must be set in type of the same minimum sizes as required for the child hazard warning. (See table in §156.60(b).)

§156.60(b) Placement and prominence - (1) Front panel statements. All required front panel warning statements shall be grouped together on the label, and shall appear with sufficient prominence relative to other front panel text and graphic material to make them unlikely to be overlooked under customary conditions of purchase and use. The table below shows the minimum type size requirements for the front panel warning statements for various front panel sizes.

Size of Label	POINT SIZE	
Front Panel		
(Square Inches)	Signal Word	Child Hazard Warning
5 and under	6	6
Over 5 to 10	10	6
Over 10 to 15	12	8
Over 15 to 30	14	10
Over 30	18	12

Question 2: Is a label required for pressure testing and/or inspections? If so, does it need to be a specific color (orange we assume)?

Answer 2: This is covered by the DOT regulations in 49 CFR 180.352 for intermediate bulk containers (greater

than 119 gallons). The marking does not need to be in a specific color. See the attached document for more details, but some of the key parts are:

49 CFR 180.352(f) Retest date . The date of the most recent periodic retest must be marked as provided in §178.703(b) [see below] of this subchapter.

49 CFR 178.703 **Marking of IBCs.**

(a) The manufacturer shall:

(1) Mark every IBC in a durable and clearly visible manner. The marking may be applied in a single line or in multiple lines provided the correct sequence is followed with the information required by this section in letters, numerals and symbols of at least 12 mm in height. This minimum marking size applies only to IBCs manufactured after October 1, 2001). The following information is required in the sequence presented: ...

(b) *Additional marking.* In addition to markings required in paragraph (a) of this section, each IBC must be marked as follows in a place near the markings required in paragraph (a) of this section that is readily accessible for inspection. Where units of measure are used, the metric unit indicated (e.g., 450 L) must also appear.

(1) For each **rigid plastic and composite IBC**, the following markings must be included:

(i) Rated capacity in L of water at 20 °C (68 °F);

(ii) Tare mass in kilograms;

(iii) Gauge test pressure in kPa;

(iv) Date of last leakproofness test, if applicable (month and year); and

(v) Date of last inspection (month and year).

(2) For each **metal IBC**, the following markings must be included on a metal corrosion-resistant plate:

(i) Rated capacity in L of water at 20 °C (68 °F);

(ii) Tare mass in kilograms;

(iii) Date of last leakproofness test, if applicable (month and year);

(iv) Date of last inspection (month and year);

(v) Maximum loading/discharge pressure, in kPa, if applicable;

(vi) Body material and its minimum thickness in mm; and

(vii) Serial number assigned by the manufacturer.

(3) Markings required by paragraph (b)(1) or (b)(2) of this section may be preceded by the narrative description of the marking, e.g. "Tare Mass: * * *" where the " * * *" are replaced with the tare mass in kilograms of the IBC.

(4) ...



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Question 3: What, if anything is required on the labels for each opening?

Answer 3: There are no specific requirements for labels for each opening of a refillable pesticide container.

I hope this information is helpful.

Nancy Fitz

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Pesticide container & containment web site: <http://www.epa.gov/pesticides/regulating/containers.htm>

▼ "Joanne Durand" ---06/17/2011 02:59:29 PM---Hi Nancy, I have some questions regarding the EPA labeling regs coming up in August:

From: "Joanne Durand" <joanne@aginfoldata.com>
To: Nancy Fitz/DC/USEPA/US@EPA
Cc: <eric@aginfoldata.com>
Date: 06/17/2011 02:59 PM
Subject: Labeling requirements

Hi Nancy,

I have some questions regarding the EPA labeling regs coming up in August; Kent suggested I send them directly to you rather than me trying to decipher them. I've cc'd Eric (Tech Support here) as he will also need this information for some items he is working on. I appreciate any and all assistance you can give.

Are there specific labeling requirements for the containers – is there something you might be able to send me? Or if it's easier to answer the specific questions below that would be great.

Question 1: Are there any requirements for label size; min, max or otherwise for containers?

Question 2: Is a label required for pressure testing and/or inspections? If so, does it need to be a specific color (orange we assume)?

Question 3: What, if anything is required on the labels for each opening?

Thank you so much for your help!

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yy9DADcAAAAAAAARGVzY3JpcHRpb246IGNpZDpwYXJ0Mi4wMTA3MDMwNC4wNTA5MDgwOUBhZ2lu



Zm9kYXRhLmNvbQ==

yy9DADcAAAAAAAARGVzY3JpcHRpb246IGNpZDpwYXJ0My4wNjAzMDYwNS4wNTAyMDMwOUBhZ2lu



Zm9kYXRhLmNvbQ==
yv9DADcAAAAAAAAAARGVzY3JpcHRpb246IGNpZDpwYXJ0NC4wMDA5MDQwNi4wNTA5MDUwOEBhZ2lu
Zm9kYXRhLmNvbQ==